

**Appendix P**  
**Public Comments and Agency**  
**Responses on the Draft EIS and LUPAs**

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# APPENDIX P – PUBLIC COMMENTS AND AGENCY RESPONSES ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND PROPOSED LAND-USE PLAN AMENDMENTS

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## P.1 Introduction and Background

Appendix P contains the comments received by the Bureau of Land Management (BLM) regarding the Draft Environmental Impact Statement (EIS) and Land-use Plan Amendments (LUPA) for the Energy Gateway South Transmission Project (Project), and the BLM’s responses to those comments.

The BLM published a Notice of Availability of the Draft EIS for public review and comment in the *Federal Register* on February 21, 2014 (Volume 79, Number 35, page 9916). The U.S. Environmental Protection Agency (EPA) also published a Notice of Availability of the Draft EIS for public review and comment in the *Federal Register* on the same day, which initiated a 90-day public comment period.

The availability of the Draft EIS; deadline for public comments; and locations, dates, and times of public meetings on the Draft EIS were announced in paid newspaper legal notices, paid newspaper advertisements, and project newsletters that were mailed to affected property owners, agencies, and stakeholders. Federal, state, and local government agencies; institutions; organizations; and individuals were sent copies of the Draft EIS and LUPAs (29 paper copies and 71 electronic copies) for review and comment.

During the 90-day comment period, the BLM conducted 12 open-house meetings to provide the public with an opportunity to view informational displays on the Project, discuss the Project individually with BLM staff and representatives, and provide comments on the Draft EIS and LUPAs. The public open houses were held on from March 10 through 13, March 17 through 20, and March 31 through April 3, 2014. The open houses were held in Grand Junction, Rangely, and Craig, Colorado; Vernal, Fort Duchesne, Roosevelt, Green River, Price, Mountain Pleasant, and Nephi, Utah; and Baggs and Rawlins, Wyoming, respectively. A total of 279 people attended the public open houses.

### P.1.1 General Summary of Comments

During the 90-day comment period, 180 submittals offering comments on the Draft EIS and LUPAs were received from various federal, state, and local agencies; various special interest groups; corporations, and public citizens. This included 61 emails, 63 letters, and 56 comment forms with comments submitted at the public open house meetings and mailed to the BLM. A list of agencies, organizations, and individuals who commented on the Draft EIS is presented in Table P-1.

<b>TABLE P-1 GUIDE TO AGENCIES, ORGANIZATIONS, AND INDIVIDUALS WHO PROVIDED WRITTEN COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND LAND-USE PLAN AMENDMENTS</b>	
<b>Submittal Number</b>	<b>Name/Affiliation</b>
<b>Federal</b>	
F1	U.S. Environmental Protection Agency
F2	U.S. Fish and Wildlife Service
F3	National Park Service

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<b>Submittal Number</b>	<b>Name/Affiliation</b>
F4	Utah Reclamation Mitigation and Conservation Commission
F5	Western Area Power Administration
<b>State</b>	
S1	Colorado Parks and Wildlife
S2	Utah Public Lands Policy Coordination (Office of the Governor)
S3	State of Wyoming – Governor’s Office
S4	Wyoming Department of Environmental Quality
S5	Wyoming Game and Fish Department
S6	Wyoming Office of State Lands and Investments
<b>County</b>	
C1	Board of Carbon County Commissioners
C2	Coalition of Local Governments
C3	Central Utah Water Conservancy District
C4	Duchesne County Commission
C5	Medicine Bow Conservation District
C6	Moffat County Commissioners
C7	Sanpete County Economic Development
C8	Sanpete County Commissioners
C9	Sanpete County Public Lands Council
C10	Sanpete County Zoning Administration
C11	Sanpete Water Conservancy District
C12	Sweetwater County Commissioners
<b>City/Town</b>	
CT1	Fairview City
CT2	Mount Pleasant City
<b>Special Interest</b>	
SI1	Audubon Rockies, Conservation Colorado, Southern Utah Wilderness Alliance, The Wilderness Society, Natural Resources Defense Council, Wild Utah Project, Western Resource Advocates, National Wildlife Federation, WildEarth Guardians
SI2	Argyle Wilderness Preservation Corporation
SI3	Defenders of Wildlife
SI4	National Parks Conservation Association
SI5	Sierra Club
SI6	Voices of the Valley
SI7	Western States Sportsman Alliance
SI8	WildEarth Guardians
SI9	Alliance for Historic Wyoming
<b>Corporations</b>	
CP1	Anadarko Petroleum
CP2	Fairview Land and Livestock Company <sup>1</sup>
CP3	Hopcreek Hideway LLC
CP4	Church of Jesus Christ of Latter-day Saints
CP5	Moon Lake Electric Association
CP6	Myrin Ranch, Inc.
CP7	QEP Field Services Company
CP8	Questar Pipeline Company
CP9	Rocky Mountain Power
CP10	TransWest Express LLC

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<b>Submittal Number</b>	<b>Name/Affiliation</b>
<b>Individuals</b>	
I1	John and Mickey Allen
I2	Nancy and Victor Anderson
I3	Rian B. Anderson
I4	Vito Angelotti
I5	Ray Beck
I6	Tyler Bench
I7	David Bigelow
I8	Deanna D. Bigelow
I9	Devin Bigelow
I10	Janet Blytheway
I11	Elma Broadhead
I12	Elizabeth Campbell
I13	Bud Carlson
I14	Carolyn Carter – Carter Family Trust
I15	John Clark
I16	Barry L. Cook
I17	Camilyn Cook
I18	I. Branch Cox
I19	Allen M. Day, M.D.
I20	Mike Dennis – Bernell A. Dennis Family Trust
I21	Robert G. Dotson
I22	Janet Dowland
I23	Mike Duzik
I24	Renee Dykes
I25	Sheron East
I26	Don and Kathleen Eicher – letter dated April 17, 2014 <sup>2</sup>
I27	Don and Kathleen Eicher – letter dated April 25, 2014 <sup>2</sup>
I28	Affel Ereksen
I29	Carolyn Everett
I30	Gordon Everett
I31	Onieta Faatz
I32	Brian Faust
I33	Mark Faust
I34	Merrily Faust
I35	Judy Feld
I36	Todd Feld
I37	Doug Feterl – Feterl Family LLC
I38	Eric and Claudia Fossum
I39	John S. Frisby – Frisby Family LLC
I40	Byron Fryer and James A. Valdez
I41	Dave Fullmer
I42	Susan Fullmer
I43	Richard O. Funk
I44	Nolan Gray
I45	Jane Griffiths
I46	Russell and Arlene Griffiths

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<b>Submittal Number</b>	<b>Name/Affiliation</b>
I47	Frank Grover
I48	DeMar Guymon
I49	James and Mary Hatfield
I50	Nancy Hatt
I51	James Hendrickson
I52	Jeremy Hermansen
I53	Kolten Hermansen
I54	Tori Hermansen
I55	Butch Heth
I56	DeAnn C. Houghton
I57	Charles Howard
I58	Elizabeth Hunt
I59	Duron Hunter
I60	Bryce and Georgia Jackson
I61	D.R. Jackson
I62	Gary Jensen
I63	Lynne M. Jensen
I64	Jordan Jex
I65	Julye H. Jex
I66	Patty Jex
I67	Neil Jorgensen
I68	Jodi Loveless
I69	Trevor and Jodi Loveless
I70	Don Lyons
I71	Jeremy Madsen
I72	Terry Madsen
I73	John B. Magnuson
I74	Jack McAllister – letter dated April 2, 2014 letter
I75	Jack McAllister – letter dated April 7, 2014 letter <sup>1</sup>
I76	James McQueen
I77	Kathleen S. Mower
I78	Scott V. Mower
I79	Pete Norris
I80	James H. Ockey
I81	Marilyn Oden
I82	Sharon S. O’Toole
I83	Jeff and Tori Pack
I84	Greg Parker
I85	Gerald and Diane Pearl
I86	Chelsey Peck
I87	Roger Peck
I88	Roger and Melissa Peck
I89	Gordon L. Pedrow
I90	Norman and Cherie Petersen
I91	David and Susie Peterson
I92	Susie Peterson
I93	Donna Pierce

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<b>Submittal Number</b>	<b>Name/Affiliation</b>
I94	Jeff G. Rappleye
I95	Jerrold N. Rasmussen
I96	Suzan Rasmussen
I97	Maria Ricks
I98	Tim Riley
I99	J.D. Roberts
I100	Don and Carolyn Robertson
I101	Don Robinson
I102	Tiffany Robinson
I103	Janae Rowley
I104	Michael and Janae Rowley
I105	Archie and Angie Roybal
I106	Angie Roybal
I107	Archie Roybal
I108	Robert R. and Linda S. Runyan
I109	Carol Scholes
I110	Robert Scott
I111	Cherilyn T. Searle
I112	Beth Shorma
I113	Justin Slaughter
I114	Michelle Slaughter
I115	Aprille Smith
I116	Scot Smith
I117	Glen L. and Lurrine Sorenson Family Trust
I118	Nancy Stocker
I119	Robert N. Stocker
I120	David N. Sundwall
I121	Ramon and Harriett Swapp
I122	Sandra Swasey
I123	Vernon and Sandra Swasey
I124	Randall S. Thornbald
I125	Randy Thornbald
I126	David J. Uherka
I127	Dorothy Uherka
I128	Pamela Underwood
I129	Don Williams
I130	Travis Winder
I131	Lois Dennis Woffinden, Trustee
I132	Max G. Worthington
I133	Robert and Sandy Wright
I134	Stan and JoDean Wright
<b>Form Letters</b>	
FL1	Form letter 1 (see list)
FL2	Conservation Colorado (see list)
<p>NOTES:  <sup>1</sup>Duplicate letter sent as a corporation and as an individual  <sup>2</sup>Duplicate letter, but one addressed to Juan Palma and one addressed to Tamara Gertsch</p>	

In compliance with the requirements of Council on Environmental Quality regulations for implementing National Environmental Policy Act (NEPA), all substantive comments received were assessed and a response provided. Of the 180 comment submittals received, 1,611 comments were identified as substantive according to BLM guidelines (BLM’s NEPA Handbook, H-1790-1, January 2008). Most individual comment submittals had multiple comments. The handbook defines substantive comments as doing one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EIS
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis
- Present new information relevant to the analysis
- Present reasonable alternatives other than those analyzed in the EIS
- Cause changes or revisions in one or more of the alternatives

Comments not considered substantive include those:

- In favor of or against the Proposed Action or alternatives without reasoning that meets the BLM’s definition of substantive comments
- Only agreeing or disagreeing with BLM policy or resource decisions without justification or supporting data that meet the BLM’s definition of substantive
- Pertaining to the Project area or Project
- Taking the form of vague, open-ended questions

Submittals containing substantive comments on the Draft EIS and LUPAs are reproduced in full and presented at the end of this appendix—categorized by federal agencies, state agencies, local agencies, special interest groups, corporations, individuals, and form letters. Each substantive comment in a submittal is bracketed in the left margin and labeled with a letter, which corresponds with the BLM’s response on the right side of the page. Comments received on the Draft EIS fall into the categories presented in Table P-2.

## P.1.2 Issues and Key Comments

Table P-2 indicates the number of substantive comments received (1,611 comments) by issue. The final column indicates the percentage of comments for each issue in relation to the total number of substantive comments received.

TABLE P-2 COMMENTS BY ISSUE		
Issue	Number of Comments	Percent of Total
Agencies’ purpose and need	3	<1
Air quality and climate change	8	<1
Alternatives routes analysis and effects analysis	297	15
Applicant’s interest and objectives	27	1
Congressionally designated areas, special designations, and other management areas	86	4
Cultural resources	11	1
Decision rationale	34	2
Environmental justice	1	<1
Fish and aquatics resources and water resources	51	3
Geologic hazards, soils, and minerals	36	2
Inventoried roadless areas	1	<1

<b>TABLE P-2 COMMENTS BY ISSUE</b>		
<b>Issue</b>	<b>Number of Comments</b>	<b>Percent of Total</b>
Land use (existing, future, zoning), grazing, and parks, preservation, and recreation resources	126	6
Mitigation measures	125	6
National historic and scenic trails	3	<1
Native American concerns	6	<1
Lands with wilderness characteristics	27	1
Other comments received	166	10
Paleontological resources	1	<1
Permitting and approvals	22	1
Plan of Development	14	1
Project description	73	4
Public health and safety (includes electromagnetic frequency, noise, and general)	34	2
Social and economic conditions	45	2
Transportation and access	8	<1
Vegetation, (includes noxious and invasive weeds, special status, and other)	29	1
Visual resources	88	4
Wildland fire ecology and management	1	<1
Wildlife (includes migratory birds, sage grouse, and special status species)	282	14
<b>Total</b>	<b>1,605</b>	<b>100</b>

Provided below is a summary description of the comments on these issues.

### **P.1.2.1 Agencies' Purpose and Need**

Comments were received from the Sierra Club, PacifiCorp, doing business as Rocky Mountain Power (Applicant), and TransWest Express, LLC. The Sierra Club provided the opinion that, given the urgency of climate change, the BLM should no longer grant transmission rights-of-way based on the need identified by the Applicant. The Applicant requested that all viable, major alternative routes considered in the Draft EIS be retained for continued analysis in the Final EIS; particularly, alternative routes that avoid land of the Uintah and Ouray Indian Reservation and/or individual Indian-owned land because of their stated concern related to uncertainty in successfully negotiating rights-of-way with respective tribal governments to ultimately gain easement access on reservation lands or allotted lands. TransWest Express, LLC requested additional explanation of the BLM's criteria for determining the Agency Preferred Alternative route be added to the EIS.

### **P.1.2.2 Air Quality and Climate Change**

Comment themes related to disclosing impacts on air quality from construction activities and how the Project may contribute to climate change. Examples include the EPA requesting nitrous oxide concentration modeling; and the National Park Service (NPS) requesting a description of the site-specific mitigation measures and identification of air quality monitoring techniques to ensure fugitive dust does not exceed applicable standards during construction. The Consortium of Nine Non-governmental Organizations (the Consortium) suggested both the President's Climate Action Plan and the BLM's NEPA guidance require analysis of the type of energy-generating resources that would benefit from using the proposed transmission lines (referring to the Project, the proposed TransWest Express Transmission Project, and the potential future Zephyr Transmission Project). The Sierra Club suggested including

analytical modeling of changes to the wholesale electric power transactions assuming the Project were in place, such as additional development of coal-fired power plants and other potential energy generation facilities in Carbon County, Wyoming.

### **P.1.2.3 Alternative Routes Analysis and Effects Analysis**

The Consortium suggested that for sensitive resource areas (such as special designations or special management areas), the BLM should consider an alternative route alignment that avoids the area or burying the transmission line near or in an existing right-of-way to avoid or minimize disturbance. The Consortium also contended that presenting impacts by alternative route rather than by segment aggregates impacts at too coarse of a spatial scale to allow reviewers to understand and evaluate the level of impact across the individual segments.

Comments also were received recommending colocation of this Project with the proposed TransWest Express Transmission Project and potential future Zephyr Transmission Project, wherever possible, to minimize environmental effects. For example, the Consortium and Moffat County recommended colocation wherever the proposed or planned transmission projects would be located in a designated utility corridor.

The U.S. Fish and Wildlife Service (FWS) commented that some habitat types may take up to 25 years to return to preconstruction conditions if disturbed. As such, the FWS suggested any impact causing more than a 5-year disturbance should be considered a long-term effect.

### **P.1.2.4 Applicant's Interests and Objectives**

Comments received questioned the need for this Project. The Sierra Club expressed concern the data used in developing PacifiCorp's Integrated Resource Plan was dated. The Consortium also commented that the description of PacificCorp's energy-usage growth and resource needs are outdated and must be revised.

### **P.1.2.5 Congressionally Designated Areas, Special Designations, and Other Management Areas**

Several comments, including comments from the Consortium, included recommendations for expanded analysis of congressionally designated areas (such as the Deerlodge Road portion of the Dinosaur National Monument and the Lower Green River suitable Wild and Scenic River segment) and special designations and other management areas to ensure impacts are adequately addressed and to include analysis of compliance with resource management plan goal/objectives/prescriptions.

The NPS outlined that, by crossing the Deerlodge Road portion of Dinosaur National Monument, a right-of-way permit would be required from the NPS. For this permit to be issued, the Project would need to meet the criteria established for new developments and a site-specific analysis would be required. The NPS also stated the Project may not be compliant with the Dinosaur National Monument approved General Management Plan.

### **P.1.2.6 Cultural Resources**

The Alliance for Historic Wyoming urged the BLM to demonstrate understanding of Rural Historic Landscapes and the broader definition of traditional cultural properties in studies conducted to support consultation under Section 106 of the National Historic Preservation Act (also refer to Section P.1.2.15).

### **P.1.2.7 Decision Rationale**

Comments were received from the Sierra Club and Colorado Parks and Wildlife questioning the approach for analyzing impacts on greater sage-grouse and commenting on their preference for the transmission-line route based on potential effects on the greater sage-grouse and the objectives of the Tuttle Mountain Conservation Easement. The Sierra Club provided several comments on approaches for protecting and advancing recovery of important sage-grouse habitats.

### **P.1.2.8 Environmental Justice**

A comment from the Alliance for Historic Wyoming identified potential environmental justice concerns related to the Town of Hanna, Wyoming, because the Project will pass near the town and disrupt adjacent vistas.

### **P.1.2.9 Fish and Aquatic Resources and Water Resources**

Comments were received related to water resources, including concerns about the analysis of how the Project would cross or potentially impact these resources. Examples include the EPA’s recommendation that all water resources should be mapped in relation to the alternative routes and the impacts on individual water resources should be analyzed and disclosed. The EPA also provided comments on the cumulative effects analysis for water resources.

The FWS asked if the Applicant had identified and consulted with the FWS on the water sources to be used in construction of the Project, including the water required for mud rotary drilling. The FWS comments also included water depletions as a potential environmental effect from this Project (i.e., that a change in water use from municipal purposes to a transmission line would constitute a new depletion).

### **P.1.2.10 Geologic Hazards, Soils, and Mineral Resources**

Comments received identified potential geologic hazards along alternative routes and the need for protecting the transmission line from unstable soils. Comments also stated the Project should not take precedence over mineral leases. For example, several individuals submitted a form authorized letter discussing the potential for geologic hazards from the construction of the Project and suggested mitigation measures that would help reduce the potential for these hazards. The Utah State Office of the Governor and the Wyoming Office of State Lands and Investments commented the transmission line should be sited so as to not preclude future mineral lease development or rights-of-way (e.g., roads, pipelines) on state-administered lands.

### **P.1.2.11 Inventoried Roadless Areas**

A comment was received from the Consortium regarding the potential indirect effects on high-quality avian habitat from the Project crossing near the inventoried roadless areas (IRA) adjacent to Reservation Ridge. The Consortium commented that a route variation of Alternative COUT-C (the Agency Preferred Alternative) that follows Reservation Ridge would avoid direct impacts on the adjacent U.S. Forest Service IRA; however, indirect impacts would include increased predation and other adverse impacts on avian species that use the high-quality habitat present in the IRA.

### **P.1.2.12 Land Use (Existing, Future, Zoning), Grazing, and Parks, Preservation, and Recreation Resources**

Comments expressing concern about potential conflicts with existing or future land uses—including conflicts with planned or proposed development and recreation sites, areas, and trails and use of utility

corridors—were received. For example, Moon Lake Electric expressed concern about the Project and the proposed TransWest Express Transmission Project being located in the same corridor as a Moon Lake Electric planned transmission line. Individuals and corporations requested mitigation of effects on agricultural lands, especially if pivot irrigation is precluded by the presence of the transmission line. The Western States Sportsman Alliance suggested some compensation may be prudent for the ranches that depend on the grazing lands that may be affected. The Corporation of the Presiding Bishop of the Church of Jesus Christ Latter Day Saints expressed concern about the Project affecting recreational camp properties (Camp Timberlane and Crescent Regional Recreation Camp). Several individuals expressed concern about the Project affecting the Gooseberry Narrows Reservoir Project.

#### **P.1.2.13 Mitigation Measures**

Comments received suggested additional or modified mitigation measures for biological resources, wetlands, and watershed areas related to access roads, including implementation of buffer zones for riparian areas and measures to minimize impacts on sage-grouse. Also, the Consortium suggested the BLM should employ landscape-level mitigation to mitigate the detrimental effects on lands with wilderness characteristics, including measures such as off-site mitigation, landscape-level conservation efforts, and technological opportunities for avoiding impacts (e.g., upgrading voltage ratings on existing lines rather than building new transmission lines). The Consortium also suggested compensatory mitigation should be identified and disclosed for each alternative route and be part of the BLM’s decision on the Project; that mitigation should be identified for the cumulative effects of having potentially three new transmission projects (the Project, the TransWest Express Transmission Project, and the potential future Zephyr Transmission Project) in the same location; and that all mitigation and monitoring reports should be made available for public review.

The Sierra Club requested that the EIS demonstrate better how mitigation approaches are consistent with the BLM Draft Regional Mitigation Manual, Secretarial Order No. 3330 (refer to Section IV), and the Presidential Memorandum. The FWS suggested selective mitigation measures provide criteria or parameters so that the public may understand better what soils and vegetation types may be particularly sensitive to disturbance.

#### **P.1.2.14 National Historic and Scenic Trails**

Comments expressed concern with visual impacts on national historic and scenic trails. The Coalition of Local Governments suggested the Draft EIS did not accurately disclose the condition of trail segments.

#### **P.1.2.15 Native American Concerns**

Comments related to crossing Indian reservation lands were received from agencies including the EPA who recommended that EIS address tribal ordinances and tribal council rules and conditions for crossing reservation lands. The NPS suggested the EIS be reviewed for consistency of tribal terms (i.e., Ute Mountain Tribe versus Ute Mountain Ute Tribe) and suggested adding the Religious Freedom Restoration Act of 1993 to the list of relevant regulatory measures noted in the EIS.

#### **P.1.2.16 Lands with Wilderness Characteristics**

Comments were received regarding how lands with wilderness characteristics were addressed in the Draft EIS. The Coalition of Local Governments provided the opinion that, while the BLM has the authority to conduct inventories regarding the presence or absence of wilderness characteristics, the BLM lacks legal authority to change management of these areas to protect “alleged” wilderness. The Consortium suggested that lands with wilderness characteristics should be managed as areas of critical environmental concern or special recreation management areas and inventories of the lands with wilderness

characteristics adjacent to wilderness study area units should be completed and the results considered by BLM in their decision on the Project. The Consortium also discussed concerns with how specific units were affected and discussed in the EIS, particularly in the BLM Little Snake Field Office.

#### **P.1.2.17 Paleontological Resources**

An individual commented on potential locations for future paleontological discoveries near the Gooseberry Narrows Reservoir Project.

#### **P.1.2.18 Permitting and Approvals**

Comments from the NPS related to the process and requirements for a right-of-way permit required to cross Dinosaur National Monument were provided. Western Area Power Administration provided comments pertaining to requirements for construction of the Project near a Western Area Power Administration transmission line. The Colorado Parks and Wildlife provided information supporting their opinion that the Project would be prohibited from crossing designated conservation easements (i.e., Tuttle Ranch and Cross Mountain Ranch). The Wyoming Department of Environmental Quality stated a temporary turbidity authorization would be required since the Project could exceed turbidity criteria. Duchesne County commented they would not permit the transmission line along Alternative COUT-A due to impacts on landowners, residents, and farmers/ranchers.

#### **P.1.2.19 Plan of Development**

The EPA and Wyoming Department of Environmental Quality provided recommendations related to reclamation planning to be included in the Plan of Development (POD) once detailed design and engineering of the selected route is completed. The FWS recommended the locations of access roads for the route selected for construction should be identified in the POD and reviewed by cooperating agencies prior to the BLM and U.S. Forest Service decisions on the Project.

#### **P.1.2.20 Project Description**

Several comments received asked for clarification on some aspects of the Project description. The EPA requested additional information regarding the role of monitors during construction, operation, and maintenance of the facility.

#### **P.1.2.21 Public Health and Safety (Electromagnetic Frequency, Noise, and General)**

The NPS suggested the EIS make clear that federal and state agencies, municipalities, and local governments may adopt regulations that impose maximum noise limits or noise mitigation requirements within their jurisdictions. The NPS also suggested the Draft EIS provide estimates of transmission line noise under conditions of light precipitation (such as rain, fog, or snow) when increased humidity leads to louder transmission noise, while the ambient sound level remains low.

#### **P.1.2.22 Social and Economic Conditions**

Comments on potential socioeconomic impacts were received from the State of Utah Office of the Governor, Board of Carbon County Commissioners, Sweetwater County Commission, special interest groups, and individuals. Comments included disclosing impacts on private land values and ensuring consistency with the analysis approach used for socioeconomic assessment of the TransWest Express Transmission Project. Comments suggesting other type of indirect effects that should be included in the analysis also were received.

### **P.1.2.23 Transportation and Access**

Comments on transportation and access include potential effects on existing and development of access roads, concerns from other corporations and agencies regarding accessibility to their projects during construction of the Project, and requests that a transportation plan be part of the POD or EIS. For example, Western Area Power Administration requires the ability to access their fixed sites and transmission line structures. The Board of Carbon County Commissioners encourages planning to limit the amount of vegetation and ground disturbance from the Project. The Coalition of Local Governments suggested impacts on transportation and access should be assessed by region.

### **P.1.2.24 Vegetation (Noxious and Invasive Weeds, Special Status, and Other)**

The FWS requested further information for the reader to understand better where the Project would avoid special status plants and habitat and how mitigation measures would be applied to reduce impacts on vegetation. The FWS also requested that indirect impacts on plant species from using water from the Platte River drainage be included in the analysis and that expanded discussion in the cumulative analysis was warranted to more adequately disclose any threats posed by the Project in conjunction with the proposed TransWest Express Project.

### **P.1.2.25 Visual Resources**

The NPS and National Parks Conservation Association commented on potential visual impacts on Dinosaur National Monument if the Project would cross Deerlodge Road near the visitor kiosk.

The Coalition of Local Governments commented on potential visual impacts on possible segments of the Cherokee Trail. The Sanpete County Economic Development expressed concerns with potential visual impacts on Highway 132 in the canyon that is used as the primary access to Sanpete Valley. The Sanpete County Commissioners and Sanpete Water Conservancy District are concerned with potential visual impacts on the Huntington-Eccles Scenic Byway and Gooseberry Narrows Reservoir recreation area. Fairview City is concerned with impacts on Skyline Drive Scenic Byway (Highway 31). Individuals provided comments expressing concerns about the potential visual impacts on residential and recreational properties.

The Consortium suggested the Project would not be compliant with the objectives of the BLM visual resource management classification at the crossing of the Lower Green River Area of Environmental Concern in Uintah County.

### **P.1.2.26 Wildland Fire Ecology and Management**

A few commenters expressed concern over increased risk of wildland fire during construction due to the presence of the transmission line.

### **P.1.2.27 Wildlife (Including Migratory Birds, Sage-Grouse, and Special Status Species)**

Several comments were received expressing concern about the impacts of construction, operations, and maintenance of the transmission line on wildlife resources, especially greater sage-grouse, migratory bird habitat, and other sensitive and protected species. For example, the Sierra Club suggested an assessment tool or evaluation strategy (approved by the FWS) be used to quantify the interim and permanent impacts on habitats in terms of those provided by the habitat ecological services. They also expressed their opinion that BLM field office timing stipulations are inconsistent and inadequate to protect some

resources, as well as suggesting that wildlife protections should be consistent across BLM field office planning areas.

The FWS requested expanded analysis of migratory birds and greater sage-grouse. Also, the FWS requested the Project be sited to avoid vegetation clearing in areas of potential yellow-billed cuckoo habitat or that such areas be spanned without vegetation removal and that access roads should avoid intact riparian habitats. The FWS also suggested that compensation for lost habitat services should include compensation for long-term (post-construction) habitat loss, alteration, and fragmentation.

#### **P.1.2.28 Other Comments Received**

Some comments requested copies of Project documents, including the Record of Decision when completed.

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